

NANCY SWEENEY
CLERK DISTRICT COURT

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FILED
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**MONTANA FIRST JUDICIAL DISTRICT COURT,
LEWIS AND CLARK COUNTY**

STATE OF MONTANA,
Plaintiff,

Vs.

WILLIAM R. NOONEY,
Defendant.

Cause No.:

AD-2013-277

INFORMATION

**MIKE MENAHAN
PRESIDING JUDGE**

Comes now Jameson C. Walker and Nicholas Mazanec, Special Deputy Lewis and Clark County Attorneys, as attorneys for the State of Montana, having first obtained leave of Court as required by law, and accuse Defendant WILLIAM R. NOONEY, of having committed the following offenses:

COUNT 1

That on or about February 13, 2008, through April 19, 2009, in Lewis and Clark and Missoula Counties, Montana, Defendant committed the offense of Failure to Register as a Securities Salesperson, Common Scheme, a Felony, in violation of Mont. Code Ann. § 30-10-201(1). The facts constituting this offense are as follows:

Information

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That at the times and places mentioned above, Defendant transacted business in Montana as a securities salesperson without being registered as such with the State of Montana and without the benefit of a registration exemption.

Specifically, Defendant offered and sold advanced loan fee agreements and/or promissory notes in Montana to the following investors while not registered as a securities salesperson and without the benefit of a registration exemption: J.L., C.D., S.M., G. and B.M., J.N., R.P., K.J., B.C., G.W., J.V., J.D., and S.S.

Pursuant to Mont. Code Ann. § 30-10-306(1), the offense is punishable by a fine not to exceed \$5,000 and/or imprisonment in the state prison for a term not to exceed 10 years.

COUNT 2

That on or about February 13, 2008, through June 6, 2008, in Missoula County, Montana, Defendant committed the offense of Fraudulent Practices, Common Scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(c). The facts constituting this offense are as follows:

That at the times and place mentioned above, in connection with the offer and sale of securities within the state of Montana, Defendant engaged in a practice and course of business that acted as a fraud or deceit upon investors.

Specifically, Defendant offered and sold in Montana at least \$210,200 high-interest, short-term investment notes from Investment Enterprises, Inc. without providing prospectuses, and/or without advising investors that: 1) he was not registered to sell securities in the state of Montana, and 2) the notes were not registered in the state of Montana. He sold these notes to the following investors: J.D., B.C., G.W., J.V., R.P., and S.S.

Pursuant to Mont. Code Ann. § 30-10-306(1), the offense is punishable by a fine not to exceed \$5,000 and/or imprisonment in the state prison for a term not to exceed 10 years.

COUNT 3

That on or about August 1, 2008, through March 16, 2009, in Missoula County, Montana, Defendant committed the offense of Fraudulent Practices, Common Scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(c). The facts constituting this offense are as follows:

That at the times and place mentioned above, in connection with the offer and sale of securities within the state of Montana, Defendant engaged in a practice and course of business that acted as a fraud or deceit upon investors.

Specifically, Defendant offered and sold in Montana at least \$202,000 in high-interest investment notes from Neuma International, Inc. without providing prospectuses, and/or without advising investors that: 1) he was not registered to sell securities in the state of Montana, and 2) the notes were not registered in the state of Montana. He sold these notes to the following investors: S.M., R.P., J.N., G. and B.M., K.J., and B.C.

Pursuant to Mont. Code Ann. § 30-10-306(1), the offense is punishable by a fine not to exceed \$5,000 and/or imprisonment in the state prison for a term not to exceed 10 years.

COUNT 4

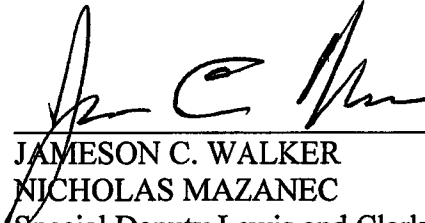
That on or about March 2009 through April 19, 2009, in Missoula County, Montana, Defendant committed the offense of Fraudulent Practices, Common Scheme, a Felony, in violation of Mont. Code Ann. § 30-10-301(1)(c). The facts constituting this offense are as follows:

That at the times and place mentioned above, in connection with the offer and sale of securities within the state of Montana, Defendant engaged in a practice and course of business that acted as a fraud or deceit upon other persons.

Specifically, Defendant offered and sold in Montana at least \$46,750 in advanced loan fee/capital investment agreements from Caldwell Marketing CMP, SA without providing prospectuses, and/or without advising investors that: 1) he was not registered to sell securities in the state of Montana, and 2) the notes were not registered in the state of Montana. He sold these notes to the following investors: J.L. and C.D.

Pursuant to Mont. Code Ann. § 30-10-306(1), the offense is punishable by a fine not to exceed \$5,000 and/or imprisonment in the state prison for a term not to exceed 10 years.

DATED this 11th day of September, 2013.



JAMESON C. WALKER
NICHOLAS MAZANEC
Special Deputy Lewis and Clark County Attorneys